

1 THOMAS D. DILLARD, JR., ESQ.
2 Nevada Bar No. 006270
3 STEPHANIE A. BARKER, ESQ.
4 Nevada Bar No. 003176
5 OLSON CANNON GORMLEY & STOBERSKI
6 9950 West Cheyenne Avenue
7 Las Vegas, NV 89129
8 (702) 384-4012 - telephone
9 (702) 383-0701 - facsimile
10 Email: tdillard@ocgas.com
sbarker@ocgas.com

11 *Attorneys for Defendants Clark County,
12 Jason Allswang, Stephanie Clevinger, Tiffany Bonnell,
13 and The Animal Foundation*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 KIMBERLY TERESE ASKEW,) CASE NO: 2:18-cv-02026-APG-BNW
17 vs.)
18 CLARK COUNTY, NEVADA; CHIEF JASON)
19 ALLSWANG, in his individual capacity;)
20 OFFICER STEPHANIE CLEVINGER, in her)
21 individual capacity; OFFICER TIFFANY)
22 BONNELL, in her individual capacity;)
23 DETECTIVE SANDRA SOUTHWELL, in her)
Defendants.)
)

)
)

STIPULATION
(FIRST REQUEST)
AND ORDER TO EXTEND
DEADLINE TO FILE REPLIES
TO PLAINTIFF'S RESPONSES
TO DEFENDANTS' MOTIONS
FOR SUMMARY JUDGMENT

24 **STIPULATION (FIRST REQUEST) AND ORDER TO EXTEND DEADLINE**
25 **TO FILE REPLIES TO PLAINTIFF'S RESPONSES AS FOLLOWS:**
26 **(1) PLAINTIFF'S RESPONSE (ECF NO. 101) TO CLARK COUNTY**
27 **DEFENDANTS' COUNTER-MOTION TO DECLARE CCC §10.32.020**
28 **CONSTITUTIONAL [ECF NO. 97];**
(2) PLAINTIFF'S RESPONSE (ECF 104) TO DEFENDANT ANIMAL
FOUNDATION'S MOTION FOR SUMMARY JUDGMENT (ECF 80);

(3) PLAINTIFF'S RESPONSE (ECF 105) TO DEFENDANT SOUTHWELL'S MOTION FOR SUMMARY JUDGMENT ON PLAINTIFF'S FOURTH AND FIFTH CAUSES OF ACTION [ECF 79]; AND
(4) PLAINTIFF'S RESPONSE (ECF 106) TO CLARK COUNTY DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT RE FOURTH AND FIFTH CAUSES OF ACTION [ECF 81]

IT IS HEREBY STIPULATED AND AGREED, by and between Defendants CLARK COUNTY, JASON ALLSWANG, STEPHANIE CLEVINGER, TIFFANY BONNELL and THE ANIMAL FOUNDATION through their attorneys THOMAS D. DILLARD, JR., ESQ. and STEPHANIE A. BARKER, ESQ. of the law firm of OLSON CANNON GORMLEY & STOBERSKI; and by Defendant SANDRA SOUTHWELL through her attorney LYSSA S. ANDERSON, ESQ. of the law firm KAEMPFER CROWELL; and by Plaintiff KIMBERLY TERESE ASKEW through her attorney PAOLA M. ARMENI, ESQ., of the law firm CLARK HILL, that the time for Defendants' Replies to Plaintiff's Responses to Motions as set forth below, may be extended:

- (1) Plaintiff's Response (ECF No. 101) to Clark County Defendants' Counter-Motion to Declare CCC §10.32.020 Constitutional [ECF No. 97]
 - (2) Plaintiff's Response (ECF No. 104) to Defendant The Animal Foundation's Motion for Summary Judgment [ECF No. 80];
 - (3) Plaintiff's Response (ECF No. 105) to Defendant Sandra Southwell's Motion For Summary Judgment on Plaintiff's Fourth and Fifth Causes of Action [ECF No. 79]; and
 - (4) Plaintiff's Response (ECF No. 106) to Clark County Defendants' Motion for Partial Summary Judgment Re: Fourth and Fifth Causes of Action [ECF No. 81].

The current deadline for Replies to all four Responses is September 7, 2020.

The requested modified deadline is September 18, 2020.

1 This first request for an extension is made due to the complex nature of the issues
 2 addressed in these motions, the number of replies due on the same date, and at Defendants'
 3 counsels' request to accommodate conflicting scheduling.
 4

5 This request is made by consent of all parties, is made in good faith, and not for the
 6 purposes of delay.

7 This is the first request for an extension of the reply deadlines regarding the subject motion
 8 responses.

9 RESPECTFULLY SUBMITTED:

10 DATED this 28th day of August, 2020.
 11 CLARK HILL, PLLC

12 */s/ Paola M. Armeni*

13 PAOLA M. ARMENI, ESQ.
 14 Nevada Bar No. 8357
 15 3800 Howard Hughes Pkwy., Ste. 500
 16 Las Vegas, Nevada 89169
 17 parmeni@clarkhill.com
 18 *Attorneys for Plaintiff*

19 DATED this 28th day of August, 2020.
 20 KAEMPFER CROWELL

21 */s/ Lyssa S. Anderson*

22 Lyssa S. Anderson, Esq.
 23 Nevada Bar No. 5781
 24 Ryan W. Daniels, Esq.
 25 Nevada Bar No. 13094
 26 1980 Festival Plaza Drive, Ste. 650
 27 Las Vegas, Nevada 89135
 28 landerson@kcnvlaw.com
rdaniels@kcnvlaw.com
Attorneys for Defendant Sandra Southwell

29 ///

30 DATED this 28th day of August, 2020.
 31 OLSON CANNON GORMLEY &
 32 STOBERSKI

33 */s/ Stephanie A. Barker*

34 THOMAS D. DILLARD, JR., ESQ.
 35 Nevada Bar No. 6270
 36 STEPHANIE A. BARKER, ESQ.
 37 Nevada Bar No. 003176
 38 9950 West Cheyenne Avenue
 39 Las Vegas, NV 89129
tdillard@ocgas.com
sbarker@ocgas.com
*Attorneys for Defendants Clark County,
 Jason Allswang, Stephanie Clevinger,
 Tiffany Bonnell, and The Animal Foundation*

ORDER

IT IS SO ORDERED that the deadline for Defendants' Replies to Plaintiff's Responses filed as ECF No.'s 101,104, 105 and 106 is extended from September 7, 2020 to September 18, 2020.

DATED: September 1, 2020

ANDREW P. GORDON
UNITED STATES DISTRICT COURT JUDGE

Law Offices of
OLSON CANNON GORMLEY & STOBERSKI
A Professional Corporation
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
(702) 384-4012 Fax (702) 383-0701